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November 22, 2019

By ECF
Hard copy to follow by mail

The Hon. Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

11/25/2019
The bond request (✓) is granted no order
Plaintiff
01/13

Re: United States v. Tagliaferro, et al.
19 Cr. 472 (PAC)

Dear Judge Crotty:

I, along with Richard Rosenberg, represent Salvatore Tagliaferro in United States v. Tagliaferro, 19 Cr. 472 (PAC), and write to respectfully request a modification of Mr. Tagliaferro's pretrial conditions of release.

Mr. Tagliaferro requests permission to travel to Orlando, Florida, to spend the Christmas holiday with friends and family. Specifically, Mr. Tagliaferro requests permission to travel to Orlando, Florida, on or about December 18, 2019, returning to New York on or about December 29, 2019. Because Mr. Tagliaferro will be traveling by car, he also asks that his conditions of release be modified to permit him to travel through all points in between and spend the night while in route if necessary.

I have spoken with Pretrial Services Officer Keyana Pompey and been informed that Pretrial Services has no objection to the instant application. I have also spoken with Assistant United States Attorney Thomas McKay and been similarly informed that the Government likewise has no objection to the instant application.

Accordingly, Defendant Salvatore Tagliaferro, by and through counsel, respectfully requests a modification of Mr. Tagliaferro's pretrial conditions of release to permit him to **travel to and from New York and Florida, passing through all points in between (and staying overnight, if necessary, during the travel), from on or about December 18, 2019, through on or about December 29, 2019.**

Thank you for your time and consideration.